

Fact Sheet



For Final Significant Modification Permitting Action Under 45CSR30 and Title V of the Clean Air Act

This Fact Sheet serves to address the changes specific to this Significant Modification, and shall be considered a supplement to the original Fact Sheet corresponding with the issuance of the initial Title V operating permit issued on July 25, 2001.

Permit Number: **R30-00300018-1996**
Plant Identification Number: **03-54-00300018**
Permittee: **Quebecor World Martinsburg**
Facility Name: **Martinsburg, WV**
Mailing Address: **871 Baker Road, Martinsburg, WV 25401**

Permit Action Number: *SM01*; Revised: *August 29, 2003*

Physical Location:	Martinsburg, Berkeley County, West Virginia
UTM Coordinates:	250.0 Easting • 4,366.5 Northing • Zone 17
Directions:	From Route 9, turn at the light towards the VA hospital. Turn at 1 st right, go ½ mile and facility is on the left.

Facility Description

Quebecor manufactures books utilizing web offset heatset lithography technology. Web offset heatset lithography uses a planographic method for image creation. The image and non-image areas are essentially on the same plane of a thin metal plate and the distinction between them is maintained chemically. Quebecor uses solvents to periodically clean the press blankets and press rollers.

The changes involved with this significant modification include the following changes:

1. Application received on February 27, 2003. In conjunction with R13-1156C, make changes to existing permit language to allow more operational flexibility. The Title V permit establishes limits for VOC and VOC-HAPs, and requires the calculation of VOC emissions by utilizing VOC-content of materials used and the usage rates (gal/month x lbs VOC/gal). In addition to these limitations/requirements, the permit also established VOC-content limits

for the various materials used at the facility. The permittee, through request of this modification, has argued that the concept of operational flexibility was inadvertently limited by the establishment of these permit limitations and requirements. This modification removes the limit on VOC-content for the various materials to allow them the flexibility to use different materials. They are still required to maintain records of name/type of all materials used, amounts used, VOC-contents, and hours of operation for the purpose of calculating emission rates.

The permittee has also requested HAP limitations of 9.4 tpy for any single HAP, and 24.4 tpy for any combination of HAP to be placed on their inks for the purpose of keeping emission rates below MACT trigger levels.

Additionally, the permittee has become aware of updated emission factors used to calculate emission limits from the combustion of fuel in the dryers, and accordingly requested that the emission limits be updated to reflect these new factors.

2. Application received on June 17, 2003. In conjunction with permit R13-1156D, the Title V permit is being modified to reflect the installation of an 8th printing press (Source ID: 13S). The installation of this press also increased the limits for fuel usage, and gallons of ink, fountain solution, blanket wash, and roller cleaner.

Emissions Summary

Emissions did not increase with respect to the revisions made in association with permit R13-1156C as noted above. However, with the addition of Press #8 (Source ID: 13S), emissions increased by the following amounts:

Emissions Source	Increase in Potential Emissions									
	CO		PM		NO _x		SO ₂		VOC	
	lb/hr	tpy	lb/hr	tpy	lb/hr	tpy	lb/hr	tpy	lb/hr	tpy
13S (Press #8)	0.21	0.92	0.019	0.08	0.4	1.75	0.027	0.12	5.41	23.71
Blanket Wash	--	--	--	--	--	--	--	--	0.87	3.79
Roller Cleaner	--	--	--	--	--	--	--	--	0.15	0.68
Total Increase:	0.21	0.92	0.019	0.08	0.4	1.75	0.027	0.12	6.43	28.18

Title V Program Applicability Basis

With the proposed changes associated with this modification, this facility maintains the potential to emit over 100 tons per year of volatile organic compounds. Due to this facility's potential to emit over 100 tons per year of a criteria pollutant, Quebecor World Martinsburg is required to have an operating permit pursuant to Title V of the Federal Clean Air Act as amended and 45CSR30.

Legal and Factual Basis for Permit Conditions

The State and Federally-enforceable conditions of the Title V Operating Permits are based upon the requirements of the State of West Virginia Operating Permit Rule 45CSR30 for the purposes of Title V of the Federal Clean Air Act and the underlying applicable requirements in other state and federal rules.

The modification to this facility has been found to be subject to the following applicable rules:

Federal and State: 45CSR13 Permit to Construct/Modify/Relocate
45CSR30 Operating permit requirement.

State Only: N/A

Each State and Federally-enforceable condition of the draft Title V Operating Permit references the specific relevant requirements of 45CSR30 or the applicable requirement upon which it is based. Any condition of the draft Title V permit that is enforceable by the State but is not Federally-enforceable is identified in the draft Title V permit as such.

The Secretary's authority to require standards under 40 C.F.R. Part 60 (NSPS), 40 C.F.R. Part 61 (NESHAPs), and 40 C.F.R. Part 63 (NESHAPs MACT) is provided in West Virginia Code §§ 22-5-1 *et seq.*, 45CSR16, 45CSR15, 45CSR34 and 45CSR30.

Active Permits/Consent Orders

Permit or Consent Order Number	Date of Issuance	Permit Determinations or Amendments That Affect the Permit (<i>if any</i>)
R13-1156C	October 11, 2001	R13-1156D
R13-1156D	May 19, 2003	

Conditions from this facility's Rule 13 permit(s) governing construction-related specifications and timing requirements will not be included in the Title V Operating Permit but will remain independently enforceable under the applicable Rule 13 permit(s). All other conditions from this facility's Rule 13 permit(s) governing the source's operation and compliance have been incorporated into this Title V permit in accordance with the "General Requirement Comparison Table A," which may be downloaded from DAQ's website.

Determinations and Justifications

1. The particulate matter emission limits established in permit condition III.B.2.a.iv., which were the maximum allowable by 45CSR7, were removed from the permit. These limits were instead streamlined with the more stringent emission limits set forth in III.B.2.a.vi. and III.B.2.a.ix.
2. The removal of permit condition III.E.2. containing the VOC-content limits for ink, fountain solution, blanket wash, roller cleaner, and water-based glue was determined to be appropriate due to the permit still maintaining the permittee to keep records on name/type of materials, amounts used, VOC-content, and estimated emission rates. Removal of the VOC-content limits allows the permittee operational flexibility without compromising their ability to demonstrate compliance with the applicable requirements established in their Title V permit.

The existing monitoring, recordkeeping and reporting requirements established in Section III.C. of the Title V permit already encompasses the additional printing press, and therefore no additional monitoring requirements were deemed necessary.

Insignificant Activities

Insignificant emission unit(s) and activities are identified in the Title V application.

Comment Period

Beginning Date: July 11, 2003
Ending Date: August 10, 2003

All written comments should be addressed to the following individual and office:

Toby Scholl
Title V Permit Writer
West Virginia Department of Environmental Protection
Division of Air Quality
7012 MacCorkle Avenue, SE
Charleston, WV 25304-2943

Procedure for Requesting Public Hearing

During the public comment period, any interested person may submit written comments on the draft permit and may request a public hearing, if no public hearing has already been scheduled. A request for public hearing shall be in writing and shall state the nature of the issues proposed to be raised in the hearing. The Secretary shall grant such a request for a hearing if he/she concludes that a public hearing is appropriate. Any public hearing shall be held in the general area in which the facility is located.

Point of Contact

Toby Scholl
West Virginia Department of Environmental Protection
Division of Air Quality
7012 MacCorkle Avenue, SE
Charleston, WV 25304-2943
Phone: 304/926-3727 • Fax: 304/926-3739

Response to Comments

N/A